

UNITED STATES DISTRICT COURT

for the

District of South Carolina

____ COLUMBIA ____ Division

MAURICE WYMAN SCOTT

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ASSOCIATES ASSET RECOVERY LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR THE CONVERSION OF PROPERTY

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name MAURICE WYMAN SCOTT

Street Address 112 FISHERS SHORE ROAD

City and County COLUMBIA, SOUTH CAROLINA

State and Zip Code SOUTH CAROLINA 29223

Telephone Number 8034974800

E-mail Address APPROVEO1@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 10 (Rev. 12/16) Complaint for the Conversion of Property

Defendant No. 1

Name	ASSOCIATES ASSET RECOVERY LLC
Job or Title <i>(if known)</i>	REGISTERED AGENT: TAMMY S. REASON
Street Address	3601 E PALMETTO ST
City and County	FLORENCE, FLORENCE
State and Zip Code	SOUTH CAROLINA 29506
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) MAURICE WYMAN SCOTT, is a citizen of the
State of (name) SOUTH CAROLINA.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____, and
has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of the
State of (name) _____. Or is a citizen of (foreign nation)
_____.

2. If the defendant is a corporation

The defendant, (name) ASSOCIATES ASSET RECOVERY LLC, is incorporated under
the laws of the State of (name) SOUTH CAROLINA, and has its principal
place of business in the State of (name) SOUTH CAROLINA.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

MERCEDES BENZ S550 VALUED AT UP TO \$20,000.00
PUNITIVE DAMAGES VALUED AS MUCH AS \$250,000.00

III. Statement of Claim

- A. Describe the property that you own that is the subject of this complaint, including its value.

MERCEDES BENZ S550 WITH VIN NUMBER WDDNG71X07A112457

- B. How and when did you come to own the property?

PAID IN CASH IN TOTAL FROM LOVE GMC BUICK

- C. How and when did the defendant(s) obtain possession of the property? Describe with particularity the actions the defendant(s) took to convert the property.

THEY THROUGH THEIR AGENTS REMOVED THE VEHICLE BY TOW TRUCK FROM THE RESIDENCE OF THE PLAINTIFF, WITHOUT LIEN, OR INTEREST ATTACHED, REMOVED IT FROM THE NEIGHBORHOOD, AND TOOK IT TO A ROAD APPROXIMATELY 1 MILE AND LEFT ABANDONED.

- D. *(If the defendant(s) rightfully came into possession of the property)*: Describe how and when you notified the defendant(s) that the property belonged to you. Describe how and when you demanded that the defendant(s) deliver or return the property, and what response you received from the defendant(s). Attach a copy of any written correspondence with the defendant(s), if such copies exist.

NA

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

THE FULL MARKET VALUE OF THE VEHICLE, AS WELL AS \$250,000.00 IN PUNITIVE DAMAGES HAVING THE OBLIGATION TO VERIFY THE VIN NUMBER ON THE CAR, PRIOR TO REMOVING IT, WHICH THEY DIDN'T, AND AFTER REMOVING A VEHICLE THEY HAD NO RIGHTS OR INTEREST IN, REALIZING IT WAS THE WRONG VEHICLE, ABANDONED THE VEHICLE SIDE THE ROAD, HAVING STRIPPED THE TRANSMISSION, DAMAGED THE FRONT FAIRING, AND BENT THE RIGHT FRONT RIM.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

1/9/2018

Signature of Plaintiff

Maurice Wyman Scott

Printed Name of Plaintiff

MAURICE WYMAN SCOTT

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address